

Office of the General Manager

February 13, 1998

Mr. Kevin Mayer Remedial Project Manager U.S. Environmental Protection Agency Region 9 - Mail Code SFD73 75 Hawthorne Street San Francisco, California 94105

Dear Kevin:

Metropolitan's Concerns with Perchlorate in Colorado River Water

The Metropolitan Water District of Southern California (Metropolitan) recently detected perchlorate in its Colorado River water supply. Investigation has demonstrated that the perchlorate is entering the Colorado River from Lake Mead via the Las Vegas wash. Perchlorate-laden groundwater from nearby industrial facilities is the source of perchlorate. To date, levels found have ranged from 5 to 9 parts per billion (ppb), well below the California Action Level of 18 ppb. The Southern Nevada Water Authority (SNWA), which also withdraws Colorado River water from Lake Mead, has recently observed perchlorate levels up to 16 ug/l in their intake.

Although our water supplies are well below the perchlorate standard, we remain concerned because of the following reasons:

- 1. Perchlorate detection at any level could be cited in multi-plaintiff lawsuit. Perchlorate, as well as solvents, has been cited in recently filed multi-plaintiff lawsuits seeking compensation for health effects claimed to result from levels of these contaminants even though appropriate state and federal standards were being met. The threat of these suits is very real and has caused great concern among our member agencies and subagencies (see Attachment No. 1). These lawsuits could have a huge impact on water suppliers. For example, a recent, similar multi-plaintiff lawsuit against Pacific Gas and Electric was settled out of court for hundreds of millions of dollars.
- 2. <u>Perchlorate detection must be reported in our Consumer Confidence</u>
 <u>Reports.</u> Metropolitan, its member agencies, and its subagencies must report
 perchlorate detections in our annual Consumer Confidence Reports if perchlorate
 is found above the detection limit of 4 ppb. These reports are distributed to our 16
 million consumers. Reporting a perchlorate detection will undermine public

confidence in our drinking water (see the excellent water quality we are currently able to report to our consumers in Attachment No. 2).

- 3. Perchlorate occurrence reduces our ability to make maximum use of groundwater resources. To date, 13 wells in Southern California have been identified as having perchlorate above 18 ppb, and most of these have been shut down. Treatment of these wells would be extremely expensive, involving technologies such as reverse osmosis. Blending with water that is free of perchlorate would be viable if our surface water were free of perchlorate, which it is not. Also, contamination of groundwater basins will occur as a result of using Colorado River water for recharge. The net result could be increased demands on our need for water from the Sacramento River Bay/Delta, posing a new set of environmental problems.
- 4. <u>California has legislation pending that would require a primary drinking water standard.</u> Senator Byron Sher has introduced legislation that would require a California Maximum Contaminant Level for perchlorate by July 1, 1999. This legislation was introduced as a result of the perception that the current Action Level is not adequately protective of public health. If the standard setting process results in a lowering of the perchlorate standard, Metropolitan and other water agencies could be facing high treatment costs to meet a lower standard.

We have estimated that it will take a minimum of three to five years for the Colorado River to flush itself if the contamination source in Henderson, Nevada were eliminated immediately. It may take significantly longer. There are no economically viable treatment options which could be installed quickly to remove perchlorate. Our only option is to eliminate the contamination through source protection as soon as possible.

Given EPA's emphasis on source protection, we would hope you feel as strongly about this issue as we do. Metropolitan, our member agencies and our subagencies have become extremely concerned with this perchlorate contamination problem. We look forward to EPA's assistance in cutting off this source as quickly as possible. If we can be of assistance, please let us know.

Sincerely,

Mark D. Beuhler

Director of Water Quality

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MDB/ac Attachments



Attachment No.1

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Park Water Company

October 24, 1997

E. Thornton Ibbetson Central Basin Municipal Water District 17140 S. Avalon Blvd., Suite 210 Carson, CA 90746-1218

Dear Mr. Ibbetson:

As our representative on the Metropolitan Water District of Southern California Board of Directors, I wish to communicate to you a concern that Park Water Company has regarding a recent Board decision. The Board has decided to approve the climination of the use of blending State Project water at the Diemer and Weymouth water treatment plants for the remainder of the year. This is done to reduce the cost of water, as State Project water is more expensive. Park thinks we have compelling reason for the Board to reconsider this decision.

This decision means that 100% Colorado River water will be coming out of these treatment plants. At this time, this creates an additional problem to the usual exceedance's of several secondary drinking water standards and the taste and odor problems sometimes associated with 100% Colorado River water. That problem is the presence of perchlorate in Colorado River Water in concentrations approximately 50% of the newly created California Action Level of 18 ug/L (micrograms per liter or parts per billion).

With the typical 25% blend of State Project Water, Park Water Company has been unable to detect perchlorate at the detection limit for reporting (DLR) in our six connections to MWD. Since MWD's current treatment technologies do not remove perchlorate, we anticipate we will be getting fairly high detectable levels of perchlorate at our connections. We will confirm this with sampling this week.

You may be aware that there are several law suits against water utilities in the San Gabriel Valley for serving water to their customers with perchlorate and other chemicals below drinking water standards. Suits have also been filed against the Jet Propulsion Laboratory and Cal Tech in Pasadena for supposedly contaminating the aquifer with perchlorate. These suites have been filed and must be defended, at a considerable cost to those utilities and institutions.

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While the adverse health effects are not entirely determined at this point in time, it is a lack of scientific data and information that may give us a false sense of security, not a preponderance of evidence. It is doubtful that consumers of MWD water will be happy to learn that an operational decision has been made that puts measurable levels of a rocket fuel additive into their drinking water. It is impossible to determine at this time what the tort lawyers will think of this.

While the continued blending of State Project water will cost more, Park Water Company encourages you to change the Board vote to discontinue blending at the Diemer and Weymouth treatment plants. This would be good public policy for MWD from a public relations standpoint and from a legal defense standpoint to discourage possible legal action against MWD. The extra cost of this water will be well worth the avoided legal costs, win or lose.

In addition, the usual public relations problems utilities have with customers can be avoided because 100% Colorado River water exceeds several secondary drinking water standards.

I would be happy to discuss this issue with you further at your convenience. Please call if you have any questions.

Very truly yours,

Ted D. May

Vice President and General Manager

TDM:cjv

cc:

Paul Jones

H. H. Wheeler

Gary Lynch

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

SACRAMENTO LEGISLATIVE OFFICE 1121 L Street, Suite 900, Sacramento, CA 95814

SOURCE:

Sacramento Bee

DATE:

December 31, 1997

Water fears spur claims

Lawyers lining up in Rancho Cordova

By Peter Hecht Bee Staff Writer

Seizing on reports of drifting plumes of underground chemical contaminants, attorneys are setting up offices in Rancho Cordova and taking out advertisements to solicit clients who fear their drinking water could be tainted.

One Rancho Cordova law firm took out a large advertisement in Sunday's Bee Neighbors section, asking potential clients - all in capital letters - "Have you been damaged by perchlorate contami-

Meanwhile, a Southern California law firm with a record of multimillion-dollar settlements in environmental cases has set up a full-time office in Rancho Cordova. Earlier this month, it filed suit on behalf of 47 residents - charging Aerojet, the McDonnell Douglas Corp. and three water providers with allowing chemical contaminants to taint drinking water supplies.

The flurry of legal activity was triggered by the discovery early this year of perchlorate - a rocket fuel component - in five wells near the Aerojet General Corp. plant in Rancho Cordova.

In the past three years, drifting underground plumes of chemicals, including perchlorate and other contaminants, have forced the closure of a total of 12 wells that served more than 20,000 people in the Rancho Cordova area.

At high doses, perchlorate can

interfere with the thyroid function and - in extreme cases - cause bone marrow disease. However, federal and state officials contend that the detected contamination levels were too low to trigger any significant health effects.

Environmental health specialists from Sacramento to Washington are conducting lab tests and considering other studies to determine the perchlorate danger.

Attorneys pressing legal claims say they are representing residents' concerns and pushing for more investigation into the extent of the groundwater problems. Critics, including spokespersons for local water providers, claim the legal activity is unnecessarily inciting residents' fears.

This is a matter that is so big, this is major utigation. It's going to involve major plaintiffs' firms," said Michael A. Hackard, a Rancho Cordova attorney who is working with a Beverly Hills law firm in pursuing a potential case.

A recent lawsuit from another law firm claimed defendants, including Aerojet, McDonnell Douglas and the Cordova Chemical Co., dumped numerous toxic substances during the Cold War era, creating "a plume of contaminated groundwater" that "continues to spread to surrounding neighborhoods.

Aerojet and the U.S. Air Force have spent more than \$160 million for toxic cleanup operations for the Aerojet site since the early 1980s. While officials couldn't be reached for comment on the suit, Suzanne Phinney, Aerojet's vice president for environmental safety, recently said the company is undertaking "the largest cleanup operation in the world.

On the Aerojet property, numerous fuels and solvents were dumped as Aerojet and McDonnell Douglas assembled and tested launch vehicles used for space and defense programs, including Minuteman and Titan missiles and Delta satellite boosters.

Spokesmen for three regional water providers vehemently denied charges in the recent lawsuit, which claimed they "knowingly operated and maintained wells which provided contaminated

drinking water."

"There's a group of Southern California attorneys that have decided that they're going to get rich quick by suing all the water purveyors," responded Herb Niederberger, manager of operations for the Citizens Utility Corp. " They're preying on people's fears and they're attacking the wrong people."

Citizens Utility itself sued the Air Force over pollution drifting toward its wells from the former Mather Air Force Base. Niederberger said the affected Citizens' wells - none of which were contaminated with perchlorate were shut down before any chemical levels exceeded safe drinking

standards.

John Redding, district manager for the Arden-Cordova Water Service, which had three drinking water wells tainted by perchlorate, said the wells were shut down immediately and that residents were connected to alternate drinking supplies. "We're making sure the water we provide is safe,

Anderson/lawsuit/table-2.doc

Cla	ss Action Lawsuits Involving	Water Supplies in MW	D Service Area as of 8/6/97			
Case	Filed: January 10, 1997 By: Wasserman, Comden & Casselman, and Girardi & Keese Assigned to: Judge Ozintra Janavs	Filed: April 24, 1997 By: Engstrom, Lipscomb & Lack; Girardi & Keese, and Dewitt, Algorri & Algorri	Filed: July 29, 1997 By: Rose, Klein & Marias Assigned to: Judge Wendell Mortimer, Jr.			
Against	Jet Propulsion Laboratory, California Institute of Technology	Southern California Water Company	*Polluters*, including: Water Companie Aerojet Suburban Water Huffy Southwest Water Mobil Oil Covina Irrigation Wynn Oil Calif, Domestic Hartwell San Gabriel Val Fairchild Industries Water Oil & Solvent Process Baxter Healthcare Azusa Land Reclamation			
Complaint For	Battery Wrongful death Survival action Negligence Strict liability Intentional infliction of emotional distress Negligent infliction of emotional distress Public nulsance	Negligence Wrongful death Strict liability Trespass Public nuisance Private nuisance Negligence per se Strict liability for ultrahazardous activity Fraudulent concealment	Negligence Wrongful death Strict liability Trespass Continuing trespass Public nuisance Private nuisance Continuing nuisance Negligence per se Absolute liability for ultrahazardous activity Fraudulent concealment			
Allegations	Discharge of highly toxic and dangerous materials into the ground, groundwater, air and sewers at or near the site, including: Various carcinogenic hydrocarbons Bromodichloromethane Carbon tetrachloride Chloroform Dichloromethane Methylene chloride Vinyl chloride Various metals TCE MEK CCI ₄ Freon 113 THF Toluene 1,1,1-TCA PCE "Nitrates" Benzene PCBs 1,2-DCA	Maintenance of contamination in well water resulting in contamination of groundwater, soil, subsurface soil and air with: TCE PCE CCIa Other solvents	Release and/or disposal of hazardous contaminants including: TCE PCE CCl4, and/or perchlorate into the soil, air and/or groundwater located in or about the San Gabriel Valley			
Communities	Pasadena	Arcadia Monrovia I emple City El Monte	Arcadia Hacienda Heigh Azusa Irwindale Baldwin Park Rosemead Covina San Gabriel El Monte South El Monte Glendora West Covina			
Superior Ct.	Los Angeles	Just moved to Pasadena	Pomona			

Attachment No. 2

Metropolitan Water District of Southern California ANNUAL WATER QUALITY REPORT 1996 (a)

	ANN		Overall range				
			Diemer	FILTRATION PLAN Jensen	Skinner	Milis	for all plents
PARAMETER	MCL	Weymouth	14	100	18	99	0-100
Percent State Project Water	NS	15	14		•		
PRIMARY STANDARDS—Mandatory Hea	ith-Related Standa	rds					
CLARITY			0.08	0.07	0.08	80.0	0.06-0.11
Filter Effluent Turbidity (NTU)	0.5 (b)	0.07	0.00				
MICROBIOLOGY c)		Dieteibution	-Svetom-Wide Mon	thiy Average = 0.12%			0-1.1%
Total Coliform	5.0% (c)						
Fecal Coliform/E. coli	(C)	5.00.05.05	-,	rage and Range = No			
CRGANIC CHEMICALS mg L			•			ND	ND
Pasucides PCBs	0.002	ND	ND	ND	DN DN	ND	ND
Alachlor Atrazine	0.003	ND	ND	ND ND	ND	ND	ND
Bentazon	0.018	GN	70 70	ND	ND	ND	ND
Carbofuran	0.018 0.0001	ND ND	ND	ND	ND	ND	ND ND
Chlordane	0.007	ND	ND	ND	ND	ND ND	ND
2,4-D Dalapon	0.2	ND	ND	ND ND	ND ND	ND	ND
Dibromochloropropane (DBCP)	0.0002	ND	ND ND	ND ND	ND	ND	ND
Dinoseb	0.007	ND ND	ND	ND	ND	ND	ND
Diquat	0.02 0.1	ND	ND	ND	ND	ND	ND ND
Endothall	0.002	ND	ND	ND	ND ND	ND ND	ND
Endrin Ethylene dibromide (EDB)	0.00005	ND	ND	ND ND	ND	ND	ND
Glyphosate	0.7	ND ND	ND ND	ND	ND	ND	ND
Heptachlor	0 00001 0.00001	ND	NO	ND	ND	ND	ND ND
Heptachlor epoxide	0.00001	ND	٧C	ND	ND ND	ND ND	ND
Lindane Methoxychlor	0 04	ND	NO NO	ND ND	ND	ND	МÐ
Molinate	0 02	ND	70 70	ND	ND	ND	ND
Oxamyl	0 2 0.001	ND ND	ND	ND	ND	ND	ND ND
Pentachlorophenol	0.5	ND	NC	ND	ND ND	ND ND	ND
Picloram Polychlorinated Biphenyls (PCBs)	0.0005	ND	ND	ND ND	ND	ND	ND
Simazine	0 004	ND	ND ND	ND	ND	NĐ	ND
2,4,5-TP (Silvex)	0.05	ND ND	ND	ND	ND	ND	ND ND
Thiobencarb	0.07(#0.001)	ND	ND	ND	ND	ND	NO
Toxaphene	0,000			ND	ND	ND	ND
Benzo(a)pyrene	0.0002	ND	ND ND	ND	ND	ND	ND
Dif2-ethylhexylladipate	0.4	DN DN	ND	ND	ND	ND	ND ND
Dir2-ethylhexyi)phthalate	0.004 0.001	ND	√c	ND	ND	ND ND	ND
Hexachlorobenzene Hexachlorocyclopentadiene	2 05	ND	70	ND	ND ND	ND	ND
2.3 7.8-TCDD - Dioxin)	3x 10 ⁻⁸	ND	N₽	ND	110		
, ,		ND	NC	ND	ND	ND	ND
Benzene	0 001 0.0005	ND ND	ND	ND	ND	ND	ND ND
Carbon Tetrachioride	0.0003	ND	ND	ND	ND ND	ND ND	ND
2-Dichlorobenzene 1,4-Dichlorobenzene	0 005	ND	ND	ND ND	ND	ND	ND
1 1-Dichloroethane	0.005	ND	ND ND	ND	ND	ND	ND
1.2-Dichloroethane	0.0005	ND ND	ND	ND	ND	ND	ND ND
1,1-Dichloroethylene	0.006 0.006	ND	ND	ND	ND	ND ND	ND
cis-1,2-Dichloroethylene trans-1,2-Dichloroethylene	0.01	ND	ND	ND ON	ND ND	ND	ND
Dichloromethane (methylene chloride)	0.005	ND	ND ND	ND	ND	МÐ	ND
1,2-Dichloropropane	0.005	ND ND	ND	ND	ND	ND	ND ND
1,3-Dichloropropene	0.0005 0.7	ND	ND	NĎ	ND	ND ND	ND
Ethylbenzene Methyl tert-butyl-ether (MTBE)	NS	ND	ND	DN ON	ND ND	ND	ND
Monochlorobenzene	0.07	ND	ND ND	ND	ND	ND	ND
Styrene	0.1	ND ND	ND	ND	ND	ND	ND ND
1,1 2.2-Tetrachloroethane	0 001 0 005	ND	ND	ND	ND	ND ND	ND ND
Tetrachloroethylene Toluene	0.15	ND	ND	. ND	ND ND	ND	ND
1 2,4-Trichlorobenzene	0 07	ND	ND	, ND ND	ND	ND	ND
1,1,1-Trichloroethane	0.200	ND	ND ND	ND	ND	ND	ND ND
1,1,2-Trichloroethane	0 005 0.005	ND ND	ND	ND	ND	ND ND	ND ND
Trichloroethylene Trichlorofluoromethane	0.005	ND	ND	ND	ND ON	ND ON	ND
1,1,2,Trichloro-1,2,2-trifluoroethane	1.2	DM	ND	ND ND	ND	ND	ND
Vinyl chloride	0.0005	ND	ND ND	ND ND	ND	ND	ND
Xylenes	1.750 0.10	ND 0.039	0.538	0 056	0.040	0.063	0 020-0.088
Fotal Trihalomethanes (d)	0 10	0.000					

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NORGANIC CHEMICALS mg L.							
Afuminum	1(#0.2)	0.161	0.169	0.083	0.220	0.006	ND-0.344
Antimony	0.006	ND	ND	ND	ND	ND	ND
Arsenic	0.05	0.0021	0.0022	ND	0.0020	ND	ND-0.0030
Asbestos (e)	7	ND	ND	ND	ND	ND	ND
Barium	1	0.119	0.116	0.036	0.117	0.030	0.030-0.126
Beryllium	0.004	ND	! ND	ND	ND	ND	ND
Cadmium	0.005	ND	ND	DA	ND	ND	
Chromium	0.05	ND	ND	ND	ND ND	ND ND	ND
Copper	(1)(#1.0)	ND	ИD	ND	ND		ND
		ND	ND			ND	ND-0.011
Cyanide	0.2			ND	ND	ND	ND
Fluoride (g)	1.4-2.4	0.22	0.23	0.26	0.21	0.10	0.08-0.30
-ead	(f)	ND	ND	ND	ND	ND	ND
Mercury	0.002	, ND	ND	ND	ND	ND	ND
Nickel	0.1	0.004	0.005	0.005	0.004	ND	ND-0.008
Nitrate (as N) (h)	10	0.21	0.22	0.42	0.13	0.57	ND-0.94
Vitrite (as N)	1	ND	ND	ND	ND	ND	ND
Nitrate plus Nitrite (as N)	10	0.21	0.22	0.42	0.13	0.57	ND-0.94
Selenium	0.05	ND	ND	ND	ND	ND	ND ND
Thallium	0.002	ND	ND	ND	ND	ND	ND
RADIONUCLIDES (pC) Li lanaivzed eve				m 3 34 to 4 35.	. 140	ND	110
Gross Alpha	15	6.6	6.5	3.0	4.9	1.4	ND-11.7
Gross Beta	50	6.8	7.8	5.7	7.7	4.6	ND-17.8
Radium-226 (i)	5	ND	1.2	1.0	ND	ND	ND-2.9
Radium-228 (i)	5	1.0	ND	ND	ND	ND	ND-1.6
Radon-222	NS	ND	ND	ND	ND	ND	ND-91
Strontium-90	8	ND	ND	ND	ND	ND	ND-2.3
Tritium	20,000	1262	ND	ND	ND	ND	ND-4473
Uranium	20	4.9	4.4	2.3	3.4	ND	ND-5.7
SECCNDARY STANDARDS—Aesthetic					•		
THEMICAL PARAMETERS							
Chloride (ma/L)	**250	91	91	53	87	55	43-102
	15						
Color (units)		3	2	3	3	3	1-4_
Corrosivity	noncorrosive	Ü)	(j)	(j)	<u>(i)</u>	(j)	ú)
Foaming Agents-MBAS (mg.L)	0.5	ND	ND	ND	ND	ND	ND
ron (mg/L)	0.3	ND	ND	ND	ND	ND	ND
Manganese (mg·L)	0.05	ND	ND	ND	ND	ND	ND
Odor Threshold (units)	3	(k)	(k)	(k)	(k)	(k)	+k)
pH (units)	NS	8.04	8.04	8.14	8.07	8.49	8.60-8.52
Silver (mg/L)	0.1	ND	ND	ND	ND	ND	ND
Specific Conductance (µmho.cm)	**900	984	997	620	943	405	336-1114
Sulfate (mg/L)	**250	244	248	120	227	37	24-294
	**500						
Total Dissolved Solids (mg/L)		611	622	371	582	. 227	190-715
Plant Effluent Turbidity (NTU)	5	0.07	0.08	0.07	80.0	0.08	0.06-0.12
Zinc (mg/L)	5.0	ND	ND	ND	ND	ND	ND
ADDITIONAL PARAMETERS							•
Alkalinity as CaCO ₃ (mg/L)	NS	114	118	100	115	70	65-132
Calcium (mg/L)	NS	68	69	44	66	20	17-80
Hardness as CaCO ₃ .mg/L)	NS	283	288	182	272	93	82-327
Heterotrophic Plate Count (CFU:mL; (I)	NS	<1	<1	<1	<1	5.1	<1-1200
Magnesium (mg/L)	NS	27.5	28	17.5	26 5	11	9.5-31.5
Potassium (mg/L)	NS	4.5	4.5	3.0	4.3	2.5	2,1-5.1
Sodium (mg/L) Total Organic Carbon (mg/L)	NS NS	96 2.38	97 2.45	55 2.94	92 2.59	42 2.47	33-112 2.03-3.19

MEY TO ABBREVIATIONS

MCL = State Maximum Contaminant Level NS = No Standard NC = Not Collected

ND = None Detected. Detection limits available on request.

NTU = Nephelometric Turbidity Units, a measure of the suspended material in water.

mg/L = milligrams per liter (parts per million)

pCvL = picoCuries per liter CFU/100 mL = colony-forming units per 100 milliliters

CFU.mL = colony-forming units per milliliter
umho.cm = micromhos per centimeter
= secondary standard
" = recommended level

The standards for acrylamide and epichlorohydrin are treatment techniques with which Metropolitan compiles

a) Data shown are annual averages and ranges

131 Data shown are annual averages and ranges
15 The turbidity level of the filtered water shall be ess than or equal to 0.5 NTU in 95% of the measurements taken each month and shall not exceed 5.0 NTU at any time.
16 Total collorism MCLs. No more than 5.0% of the monthly samples may be total collorism-positive. Fecal collorism E, coll MCLs: The occurrence of 2 consecutive total colloris-positive samples, one of which contains fecal collorism E, coll notification and the first are based on distribution system monthly sampling averages.
Compliance is based on the combined distribution system sampling from all the filtration plants.
1 185 samples were analyzed in 1996.

- Calculated from the average of monthly littration plant effluent samples. Compliance is based on a running annual average of more than 40 quarterly distribution system samples, which was 0.050 mg/L for 1996.

 Measured in million fibers per liter (longer than 10 microns).
- The standards for lead and copper are treatment techniques requiring agencies to optimize corrosion control treatment.
- (g) MCL is dependent upon air temperature
- MCL is 45 mg/L as Nitrate, which equals 10.16 mg/L as N. Standards are for Radium-226 and -228 combined.
- Corrosivity is measured by the Langlier Stability Index, A positive index, indicating non-corrosivity, was maintained at the plant effluents.
- Metropolitan has developed a flavor-profile analysis method that can more accurately detect odor occurrences. For more information, contact MWD,
- (I) Pour plate technique, 48-hour incubation at 35°C, monthly averages.

if you have additional questions or concerns regarding the duality or your water trease tail Mr. Mark D. Beunier Director of Maron Duality, at (213) 217-6650 or write to him at the Metropolitan Water District of Southern Cautomia, P.C. Box 54133, Los Angeles, California 30054-0153.